

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a)
HELLER HEALTHCARE FINANCE,)
INC.,)

Plaintiff,)

And)

MICHAEL INGOLDSBY,)

Intervenor/Plaintiff,)

v.)

Civil Action No. 05-CV-11128-NG

NATIONAL UNION FIRE)
INSURANCE COMPANY OF)
PITTSBURGH, PA., and)
INTERNATIONAL INSURANCE)
GROUP, LTD.,)

Defendants.)

**NATIONAL UNION'S MOTION FOR LEAVE OF COURT
TO FILE A MEMORANDUM OF LAW IN EXCESS OF 20 PAGES**

Pursuant to Local Rule 7.1(b)(4), Defendant National Union Fire Insurance Company of Pittsburgh, PA ("National Union") hereby moves for leave of court to allow National Union to file a twenty-eight (28) page Reply Memorandum in Support of National Union's Motion for Summary Judgment Against Plaintiff Ingoldsby and in Opposition to Plaintiff Ingoldsby's Cross-Motion for Summary Judgment.

In support of its Motion, National Union states as follows:

1. In response to National Union's Motion for Summary Judgment, Plaintiff Ingoldsby ("Mr. Ingoldsby") filed an opposition and cross-motion, together with a twenty-five (25) page memorandum of law.

2. Mr. Ingoldsby requested and this Court granted him leave to file his memorandum of law in excess of twenty pages.

3. Rather than file two separate briefs, National Union believes it would be more economical for the Court and the parties for National Union to respond to both the opposition and cross-motion in one memorandum of law.

4. In order to fully respond to the arguments made by Mr. Ingoldsby in both opposition to National Union's Motion for Summary Judgment and in support of his cross-motion, National Union requires the additional eight (8) pages of space.

Therefore, National Union's Motion for leave should be granted.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: December 8, 2006

/s/ Joey H. Lee
John D. Hughes (BBO# 243660)
Joey H. Lee (BBO# 663803)
EDWARDS ANGELL PALMER
& DODGE LLP
111 Huntington Avenue
Boston, MA 02199
Tel: (617) 239-0100
Fax: (617) 227-4420

CERTIFICATE OF SERVICE

I, Joey H. Lee, hereby certify that on this 8th day of December, 2006, I served a copy of the foregoing Motion for Leave via ECF on Gregory J. Aceto, Johnson & Aceto, P.C., 67 Batterymarch Street, Suite 400, Boston, MA 02110 and Richard E. Heifetz, Tucker, Heifetz & Saltzman, LLP, Three School Street, Boston, MA 02108.

/s/ Joey H. Lee
Joey H. Lee